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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DAVID MOODY and JULIE MOODY, on  
behalf of themselves and on behalf of all others  
similarly situated

Plaintiffs,

vs.

ROBINHOOD FINANCIAL LLC;  
ROBINHOOD SECURITIES, LLC; CITADEL  
SECURITIES LLC; CITADEL ENTERPRISE  
AMERICAS LLC F/K/A CITADEL LLC,

Defendants.

Case No.: 3:21-cv-00861-LB

**JOINT STIPULATION TO EXTEND  
DEADLINE TO MOVE OR  
OTHERWISE RESPOND TO  
PLAINTIFFS' COMPLAINT**

1 Plaintiffs David Moody and Julie Moody (“Plaintiffs”) and the undersigned Defendants  
2 (together with Plaintiffs, the “Parties”), hereby stipulate and agree as follows:

3 WHEREAS, Plaintiffs filed a Complaint on February 3, 2021 (Dkt. No. 1);

4 WHEREAS, Defendants’ deadline to move or otherwise respond to the Complaint is  
5 currently April 5, 2021;

6 WHEREAS, on February 5, 2021, the plaintiffs in *Cheng et al v. Ally Financial Inc. et al*, 21-  
7 cv-00781 (N.D. Cal.), filed a Motion for Transfer of Actions to the Northern District of California  
8 Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings (“Motion”) with  
9 the Judicial Panel on Multidistrict Litigation (“Panel”), and included this action on the schedule of  
10 actions requested to be centralized;

11 WHEREAS, on February 9, 2021, the Panel accepted the Motion for filing as *In re January*  
12 *2021 Short Squeeze Trading Litigation* (MDL No. 2989) and ordered an accelerated briefing  
13 schedule;

14 WHEREAS, on March 1, 2021, Plaintiffs filed a response to the Motion, agreeing  
15 that the cases should be centralized into one multidistrict litigation;

16 WHEREAS, a hearing on the Motion is scheduled for March 25, 2021;

17 WHEREAS, the Parties want the action to proceed in an orderly and efficient manner;

18 WHEREAS, this is the first extension that has been requested and the Parties have not  
19 obtained any previous extensions;

20 WHEREAS, Civil Local Rule 6-1 permits the Parties to “stipulate in writing, without a Court  
21 order, to extend the time within which to answer or otherwise respond to the complaint” so long as  
22 “the change will not alter the date of any event or any deadline already fixed by Court order”;

23 WHEREAS, the Parties have met and conferred and agreed to extend the deadline to move or  
24 otherwise respond to the operative Complaint to April 30, 2021, or, if the transfer motion is granted,  
25 until the date by which the transferee judge orders Defendants to move or otherwise respond to the  
26 Complaint, whichever is later;

27 WHEREAS, Defendants do not waive, and expressly reserve, all available defenses and  
28 challenges to jurisdiction; and

1 WHEREAS, such a stipulated extension would be without prejudice to Plaintiffs.

2 NOW THEREFORE, the Parties stipulate that:

- 3 1. Defendants' deadline to move or otherwise respond to the operative Complaint shall
- 4 be extended to April 30, 2021, or, if the transfer motion is granted, until the date by
- 5 which the transferee judge orders Defendants to move or otherwise respond to the
- 6 Complaint, whichever is later.
- 7 2. The Parties may stipulate to a further extension of time to move or otherwise respond
- 8 to the operative Complaint in this action.
- 9 3. Nothing herein shall prevent Defendants from moving for additional time to move or
- 10 otherwise respond to the operative Complaint.
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1 Dated: March 9, 2021

By: /s/ C. Brandon Wisoff

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24 Dated: March 9, 2021

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**ATTESTATION**

I, C. Brandon Wisoff, am the ECF User whose identification and password are being used to file this Stipulation. In compliance with Local Rule 5-1(i)(3), I attest that concurrence in the filing in this document was obtained from the above signatories.

Dated: March 9, 2021

FARELLA BRAUN + MARTEL LLP

By: /s/ C. Brandon Wisoff  
C. Brandon Wisoff

*Counsel for Defendants Robinhood  
Financial LLC, Robinhood Securities,  
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